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KAMALA D. HARRIS

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2 3 4 5 6 7 8	Attorney General of California DANIELLE F. O'BANNON Supervising Deputy Attorney General D. ROBERT DUNCAN Deputy Attorney General State Bar No. 161918 455 Golden Gate Avenue, Suite 11000 San Francisco, CA 94102-7004 Telephone: (415) 703-5739 Fax: (415) 703-5843 E-mail: Robert.Duncan@doj.ca.gov Attorneys for Defendant D. Sandoval			
9	IN THE UNITED STATES DISTRICT COURT			
10	FOR THE NORTHERN DISTRICT OF CALIFORNIA			
11	SAN JOSE DIVISION			
12				
13	JESSE WASHINGTON,	C 10-0250 LHK		
14 15 16	Plaintiff, v.	SECOND JOINT STIPULATION AND [PROPOSED] ORDER TO EXTEND EXPERT DISCOVERY DEADLINES		
17	D. SANDOVAL, et al.,			
18	Defendants.			
19				
20	Plaintiff Jesse Washington and Defendant David Sandoval (collectively, the "Parties"), by			
21	and through their respective counsel, hereby agree and stipulate as follows:			
22	1. The Court's case management order filed on November 14, 2012 set the deadlines for			
23	expert disclosures on April 29, 2013, the supplemental expert disclosures on May 13, 2013, and			
24	expert discovery on May 27, 2013.			
25	2. The Parties filed a Joint Stipulation and [Proposed] Order to Extend Expert Discovery			
26	Deadlines dated April 23, 2013 proposing to extend the expert disclosures to May 13, 2013, the			
27	supplemental expert disclosures to May 27, 2013	, and the expert discovery cutoff to June 10,		
28	2013. The Court issued an order approving the joint stipulation on April 26, 2013.			
	2nd J. Stip. & [Proposed] Order to Extend Expert Disc. Deadlines Washington v. Sandoval (C 10-0250 LHK)			

1	3. The Parties agree that two additional days are needed to prepare supplemental expert			
2	disclosures and to complete expert discovery.			
3	4. The parties hereby respectfully stipulate that the deadlines for supplemental expert			
4	disclosures be changed to May 29, 2013 and that the expert discovery cutoff be changed to June			
5	12, 2013.			
6	5. The proposed time modifications do not affect any other dates in the case schedule,			
7	including the pretrial conference and trial.			
8				
9	Respectfully submitted,			
10	May 28, 2013 By /s/ Sasha G. Rao Sasha G. Rao	_		
11	Christopher Chang sasha.rao@bingham.com			
12	christopher.chang@bingham.com Bingham McCutchen			
13				
14	Attorneys for Plaintiff JESSE WASHINGTON			
15				
16	/s/ D. Robert Duncan D. Robert Duncan	_		
17	Scott John Feudale Deputy Attorney Generals			
18	Attorneys for Defendant			
19	D. SANDOVAL			
20				
21	PURSUANT TO STIPULATION, IT IS SO ORDERED			
22	frank Kalo			
23	Dated: May 30, 2013 LUCY W KOH			
24	United States District Judge			
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	2nd J. Stip. & [Proposed] Order to Extend Expert Disc. Deadlines Washington v. Sandoval (C 10-0250 LHK)			